



Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1440-15-F

Plant ID: 1440

Effective Date: xx/xx/2015

Expiration Date: xx/xx/2020

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Algood Food Company
7401 Trade Port Drive
Louisville, KY 40258

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM/PM₁₀
Tons/year: <25

Permit Writer: Shannon Hosey

Public Notice Date: 02/18/2015

{manager1}
Air Pollution Control Officer
{date1}

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FEDDOOP Permit Revisions/Changes

Permit No.	Issue Date	Public Notice Date	Type	Page No.	Description
182-02-F	03/31/2006	12/04/2005	Initial	Entire Permit	Initial Permit Issuance
O-1440-14-F	xx/xx/20xx	02/18/2015	Renewal	Entire Permit	Scheduled Permit Renewal

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District [Form 9440-0](#).
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM10, PM2.5, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gases whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit U1**U1 Unit Description:** Peanut Butter Manufacturing**U1 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
7.08	Standards of Performance for New Process Operations	1 through 3

U1 Equipment:

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E1	Laser Sorter, BEST USA, Inc., Helius 1200 with pneumatic conveyors	7.08	C1
E2	Proctor & Schwartz, K910124 Peanut Roaster	7.08	C3
E3	Proctor & Schwartz, T21293 Peanut Roaster		
E5	Line A: Cantrell & Satake, VB 5000 & Scan Master, Two (2) Blanchers (A1 and A2) and Sorter	7.08	C5
E6	Line B: Cantrell & Satake, VB 5000 & Scan Master, Two (2) Blanchers (B1 and B2) and Sorter	6.09	

U1 Control Devices:

Control Device ID	Description Make/Model	Pollutant Controlled	Stack ID
C1	Cyclone	PM	S1
C3	Scrubber		S3
C5	Cyclone, Air Action Systems		S5

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.2)

a. PM/PM₁₀

- i. The owner or operator shall not allow or cause the plant-wide emissions of PM/PM₁₀ to equal or exceed 25 tons during any consecutive 12-month period.¹ (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1)
- ii. For Emission Point E1, the owner or operator shall not allow PM emissions to equal or exceed 16.75 lb/hr, based on actual operating hours in a calendar day.² (Regulation 7.08, section 3.1.2)
- iii. For Emission Point E2 and E3, the owner or operator shall not allow PM emissions to equal or exceed 11.73 lb/hr, based on actual operating hours in a calendar day.³ (Regulation 7.08, section 3.1.2)
- iv. For Emission Point E5, the owner or operator shall not allow PM emissions to equal or exceed 11.73 lb/hr, based on actual operating hours in a calendar day.² (Regulation 7.08, section 3.1.2)
- v. For Emission Point E6, the owner or operator shall not allow PM emissions to equal or exceed 14.74 lb/hr, based on actual operating hours in a calendar day.² (Regulation 6.09, section 3.2)
- vi. The owner or operator shall operate and maintain the control devices (C1 and C5) at all times the process equipment is in operation. (Regulation 2.17, section 5.1)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

1 On 11/25/2014, the source requested the limits of the criteria pollutant PM/PM₁₀ < 25 tpy, to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

2 A one-time PM compliance demonstration was done on 3/18/2011 and the lb/hr standards cannot be exceeded controlled.

3 Using AP-42 emission factors for coffee roasting at 0.66 lb/ton the maximum PM emissions is 4.46 lb/hr. The District has determined that the source cannot exceed the lb/hr standard uncontrolled, and thus no monitoring, recordkeeping or reporting is required for demonstrating compliance with the hourly PM emission standard.

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. PM/PM₁₀

- i. For each PM emission point, the owner or operator shall monthly monitor and maintain records of monthly throughputs during each calendar month.
- ii. The owner or operator shall maintain monthly records of monthly and 12 consecutive month PM/PM₁₀ emissions.
- iii. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- iv. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating. The records shall include:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Identification of the control device and process equipment;
 - 4) PM emissions for each hour during the bypass in lb/hr;
 - 5) Summary of the cause or reason for each bypass event;
 - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
 - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

b. Opacity

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

a. PM/PM₁₀

- i. The owner or operator shall report the calendar month and consecutive 12-month plant-wide PM/PM₁₀ emissions for each month in the reporting period.
- ii. The owner or operator shall report the following information regarding each emission point E1, E5 and E6 PM bypass activity in the annual compliance reports:
 - 1) Emission point at which the by-pass occurred;
 - 2) Date and duration (including the start and stop time) during which a bypass occurred;
 - 3) The average PM lb/hr emitted at each emission point during the bypass;
 - 4) Summary information on the cause or reason for the by-pass activity
 - 5) Corrective action taken to minimize the extent and duration of each bypass event;
 - 6) Measures implemented to prevent reoccurrence of the situation that resulted in by-pass emissions; or
 - 7) If no deviations occur during the annual reporting period, the report shall contain a negative declaration.

b. Opacity

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.

- ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.
- iii. Description of any corrective action taken for each exceedance of the opacity standard.

Emission Unit U2**U2 Unit Description:**

Ink-jet printing operation for marking cased of products

One (1) Biomist Power Sanitizing System used to sanitize food contact surfaces with alcohol based sanitizer

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
7.25	Standards of Performance for Existing Process Operations	1 through 3

U2 Equipment:

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E10	Hitachi & Videojet, PX-D260U Ink-jet Printer	7.25	N/A
E12	Sanitizing System		

U2 Control Devices:

There are no control devices associated with Emission Unit U2.

U2 Specific Conditions**S1. Standards (Regulation 2.17, section 5.2)****VOC**

For Emission Points E10 and E12, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

VOC

The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate and record the amount of VOC emissions during the 12 consecutive month period.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified in accordance with General Condition 12.

VOC

- i. The emission unit ID numbers and emission point ID numbers;
- ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- iii. Identification of all periods of exceedance of the VOC emissions limits; and
- iv. A description of corrective actions taken for each exceedance.

Insignificant Activities

Description	Quantity	Basis
Combustion sources < 10 MMBtu/hr Natural Gas (2.8 MMBtu/hr, 2.4 MMBtu/hr, 3.2 MMBtu/hr and 2.4 MMBtu/hr)	4	Regulation 1.02, Appendix A, section 1.1
Fixed or mobile internal combustion engines and vehicles used for transport of passengers or freight, unless regulated elsewhere	4	Regulation 1.02, Appendix A, section 2
Brazing, Soldering or Welding Equipment	3	Regulation 1.02, Appendix A, section 3.4
Emergency relief vents, stacks and ventilating systems	3	Regulation 1.02, Appendix A, section 3.10
Equipment using only peanut oil, sunflower oil, cottonseed oil or canola oil	3	Regulation 1.02, Appendix A, section 3.19
Dust or particulate collectors that are located in-doors, vent directly indoors into the work space, collect no more than one ton of material per year and do not collect materials listed in Regulation 5.11, 5.12 or 5.14 (Two Jar Washers that blow out any particulate matter from the jars and capture it in a filter box)	2	Regulation 1.02, Appendix A, section 3.21

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.